

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GRAHAM CHASE ROBINSON,

Plaintiff and Counterclaim Defendant,

-against-

ROBERT DE NIRO,

Defendant,

and

CANAL PRODUCTIONS, INC.,

Defendant and Counterclaim Plaintiff.

Civil Action No. 1:19-CV-09156 (LJL) (KHP)

[PROPOSED] VERDICT FORM

**PLEASE FOLLOW ALL INSTRUCTIONS,
CHECK (✓) YOUR ANSWERS, AND FILL IN THE BLANKS**

All Answers Must Be Unanimous

I. Ms. Robinson's Claims Against Mr. De Niro and Canal

Liability

1. Do you find that Mr. De Niro is liable for gender discrimination against Ms. Robinson?

YES _____ NO _____

If you answered YES to Question 1, you must also answer YES to Question 2 and then proceed to Question 3. If you answered NO to Question 1, proceed to Question 2.

2. Do you find that Canal is liable for gender discrimination against Ms. Robinson?

YES _____ NO _____

Regardless of how you answered Questions 1 and 2, proceed to Question 3.

3. Do you find that Mr. De Niro is liable for retaliation against Ms. Robinson?

YES _____ NO _____

If you answered YES to Question 3, then you must also answer YES to Question 4 and then proceed to Question 5. If you answered NO to Question 3, proceed to Question 4.

4. Do you find that Canal is liable for retaliation against Ms. Robinson?

YES _____ NO _____

If you answered YES to any of Questions 1, 2, 3, or 4, proceed to Question 5. If you answered NO to all of Questions 1, 2, 3, and 4, proceed to Question 11.

Damages

5. How much money, if any, should Ms. Robinson be awarded for non-monetary and monetary damages, such as emotional distress and out-of-pocket losses?

Answer in Dollars and Cents: \$ _____

Regardless of how you answered Question 5, proceed to Question 6.

6. How much money, if any, should Ms. Robinson be awarded for punitive damages?

Answer in Dollars and Cents: \$ _____

Regardless of how you answered Question 6, proceed to Question 7.

II. Canal's Counterclaims Against Ms. Robinson

Liability

7. Do you find that Ms. Robinson is liable for conversion of Canal's SkyMiles?

YES _____ NO _____

Regardless of how you answered Question 7, proceed to Question 8.

8. Do you find that Ms. Robinson is liable for breach of fiduciary duty against Canal?

YES _____ NO _____

Regardless of how you answered Question 8, proceed to Question 9.

9. Do you find that Ms. Robinson is liable for breach of the duty of loyalty against Canal?

YES _____ NO _____

If you answered YES to either Question 7 or 8, proceed to Question 10. If you answered NO to both Questions 7 and 8 but answered YES to Question 9, proceed to Question 11. If you answered NO to all of Questions 7, 8, and 9, skip the remaining questions and proceed to the Signatures page.

Damages

10. How much money, if any, should Ms. Robinson be ordered to pay to Canal for its monetary losses?

Answer in Dollars and Cents: \$ _____

If you answered YES to Question 9, proceed to Question 11. If you answered NO to Question 9, skip the remaining questions and proceed to the Signatures page.

11. During what date(s) or date range(s) from August 17, 2016, to April 6, 2019, if any, do you find that Ms. Robinson was substantially disloyal and should be ordered to repay her salary to Canal? (If none identified, write NONE.)

List Date(s) or Date Range(s) (include day/month/year):

If you answered NONE to Question 11, proceed to the Signatures page. Otherwise, proceed to Question 12.

12. For any period of time that you identified in response to Question 11, how much salary did Ms. Robinson earn that you find she should be ordered to repay to Canal?

Answer in Dollars and Cents: \$ _____

Regardless of your answer, proceed to the Signatures page.

III. Signatures

After completing the form, each juror who agrees with this verdict must sign below:

Foreperson

Dated: _____